

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	NO. 4:19-CR-00832
	§	
GERALD GOINES	§	

MOTION TO AMEND PRETRIAL RELEASE CONDITIONS

TO THE HONORABLE GEORGE C. HANKS JR., UNITED STATES DISTRICT
JUDGE FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION:

COMES NOW, GERALD GOINES, Defendant, by and through undersigned
counsel and respectfully moves this Honorable Court to amend the pretrial release
conditions for Mr. Goines and for good cause would show as follows:

I.

Gerald Goines has been on house arrest with an ankle monitor since November
26, 2019. He has been in compliance with his conditions of pretrial supervision at all
times over the almost 3-year period. Mr. Goines has been unable to work or to do
regular household duties since he has been confined to his home. Mr. Goines is
respectfully requesting that he be allowed to leave his home at 7:00 a.m. and return to
his home by 7:00 p.m. The government is unopposed to this request and the probation
department has not responded.

II.

Assistant United States Attorney Arthur Jones is unopposed to the suggested amendments to the proposed amendment to Mr. Goines's pretrial release conditions.

WHEREFORE, PREMISES CONSIDERED, Defendant, respectfully prays that this motion be granted, that the Court amend the conditions as to allow Mr. Goines to leave his home during the appropriate hours, earn a living, and support his family while this case is still pending.

Respectfully submitted,

/s/ Nicole DeBorde

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Attorney for Defendant,
GERALD GOINES

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CERTIFICATE OF CONFERENCE

On December 15, 2022, Counsel for Defendant conferred with AUSA Arthur Jones concerning his position on Defendant's Motion to Amend Pretrial Release Conditions. Mr. Jones stated he is unopposed to this motion. Counsel for Defendant also reached out to Pretrial Services officers Andrew Adame and Kimberly Vaults.

/s/ Nicole DeBorde
NICOLE DEBORDE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Defendant's Motion Amend Pretrial Release Conditions has been delivered to AUSA Arthur Jones via email and to Andrew Adame and Kimberly Vaults via email on this the 16th day of December, 2022.

/s/ Nicole DeBorde
NICOLE DEBORDE